

# **Exhibit C**

## SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000  
FACSIMILE: 1-212-558-3588  
WWW.SULLCROM.COM

*125 Broad Street  
New York, NY 10004-2498*

LOS ANGELES • PALO ALTO • WASHINGTON, D.C.  
FRANKFURT • LONDON • PARIS  
BEIJING • HONG KONG • TOKYO  
MELBOURNE • SYDNEY

August 13, 2013

Via E-mail

Richard W. Slack,  
Weil, Gotshal & Manges LLP,  
767 Fifth Avenue,  
New York, New York 10153-0119.

Re: *In re Lehman Brothers Holdings Inc., et al.*  
08-13555 (Bankr. S.D.N.Y.)

Dear Richard:

Pursuant to the Discovery Protocol Agreement, entered on April 1, 2013, I write on behalf of Giants Stadium LLC ("Giants Stadium") to identify the individuals that Giants Stadium seeks to depose. Those individuals are, in alphabetical order, as follows:<sup>1</sup>

Matthew Casner	Steven Howard	Stephen Lessing	Michael Sung
Katie Chan	Kyle Ingram	David Lo	Robert Taylor
Peter Coleman	Gary Killian	Julia Nand	Sean Teague
Edward Fanter	Seth Konheim	Gia Rys	Jacopo Visentini
Michael Ferraro	Jeff Kirshenbaum	Gregory Shlionsky	Anatoly Zelikoff

Please notify me by the close of business on Friday, August 16, 2013 as to which of the above individuals are current employees of Legacy Asset Management Company LLC (LAMCO) or any of its affiliated entities. Giants Stadium will proceed with serving third-party notices and subpoenas on any individual not identified as an employee by this deadline (or seek the Bankruptcy Court's permission to do so).

Sincerely,



Bruce E. Clark

---

<sup>1</sup> Giants Stadium reserves the right to identify additional individuals as discovery proceeds.